

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CASE NO. 5:22-cv-68-BO

YOLANDA IRVING, individually and as the)
natural parent and guardian of J.I, JUWAN)
HARRINGTON, CYDNEEA HARRINGTON,)
KENYA WALTON, individually and as the)
natural parent and guardian of R.W., ZIYEL)
WHITLEY, DYAMOND WHITLEY,)
KAMISHA WHITLEY, NANETTA GRANT)
as the natural parent and guardian of Z.G., and)
EMANCIPATE NC, INC.,)

Plaintiffs,)

v.)

THE CITY OF RALEIGH, Officer OMAR I.)
ABDULLAH, Sergeant WILLIAM ROLFE,)
Officer RISHAR PIERRE MONROE,)
Officer MEGHAN CAROLINE GAY,)
Officer DAVID MEAD, Officer JESUS)
ORTIZ, Officer, KYLE PERRIN, Officer)
MICHAEL MOLLERE, Officer KYLE)
THOMPSON,)
Officer VINCENT DEBONIS, Officer)
DANIEL TWIDDY, Officer THOMAS WEBB,)
Officer DAVID MCDONALD, Officer DAVID)
GARNER, Chief of Police ESTELLA)
PATTERSON, and City Manager MARCHELL)
ADAMS-DAVID, in their individual capacities,)

Defendants.

**SEU DEFENDANTS' MOTION
FOR LEAVE TO REPLY TO
EMANCIPATE NC, INC'S
MEMORANDUM IN
OPPOSITION TO CITY'S
MOTION FOR PROTECTIVE
ORDER**

Defendant Selective Enforcement Unit ("SEU") Officers David Mead, Jesus Ortiz,
Kyle Perrin, Michael Mollere, Kyle Thompson, Vincent Debonis, Daniel Twiddy,
Thomas Webb, David McDonald, and David Garner, move the Court for leave to file a

reply to Emancipate NC, Inc.'s Memorandum in Opposition to the City's Motion for Protective Order (DE [158](#)). In support of this motion, the SEU Officer Defendants rely on their proposed reply, which is being filed with the motion.

Respectfully submitted,

This the 9th day of January, 2023.

/s/ Leslie C. Packer
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